

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

## REGULATORY CONTACT RECORD

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**Date/Time:** 6/16/04 / 16:00

**Site Contact(s):** Karen Lavorato  
**Phone:** 303-994-1408

**Regulatory Contact:** James Hindman  
**Phone:** 303-692-3345

**Agency:** COLORADO DEPARTMENT PUBLIC HEALTH & ENVIRONMENT

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**Purpose of Contact:** B374 Intermodal Repack Activity

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### Discussion

Waste Operations (WO) needs to blend and/or divide B374 LLM sludge packaged in five intermodals to distribute the fissile content. WO would like to perform this repack activity outside on the 750pad, north of Tent 2, east of the barn. Repackaging is required to allow shipment to Envirocare of Utah (EOU) for treatment and/or disposal- where their radiological acceptance criteria is less than 10 nCi/gram.

WO has previously provided CDPHE with the background information on this activity, the radiological data for each intermodal and a repack optioneering evaluation to review. CDPHE expressed its desire that, if possible, these repack activities should be conducted within an enclosed or partially enclosed structure. If WO determined that this is not appropriate to do so, CDPHE requested that Kaiser-Hill provide clearly explained rationale to support the decision for why repackaging outdoors is the better option from a safety and schedule standpoint. WO believes the best and safest option is to conduct this activity outside on the 750Pad for the following reasons:

- The physical area outside is ideal to perform repack of large waste packages, requiring the use of heavy equipment. Our experienced Trackhoe Operator has expressed reservation on performing this activity safely inside a tent. The trackhoe itself has the potential to hit the overhead tent structure.
- The physical space also allows the trackhoe operator to handle several intermodals at once for mixing, which will result in less repackaging time (estimated at 4-5 days). Repackaging inside a tent would take at least five times longer.
- The Trackhoe Operator will have limited visibility of the waste inside the tent, since the intermodals will be sitting on the trailer beds versus the ground if the work was completed outside.

- If the work is completed inside a tent, proper ventilation cannot be provided for the diesel exhaust; therefore, the workers will be required to wear SCBA. Ventilation is not a concern outside, which does not put our workers at risk.
- If the work is completed inside a tent, the large doors of the tent would have to remain open during repack allow movement of the trackhoe. As far as exposure to the air, this configuration is really no different than performing the repack outside, except for the inclement weather protection.
- The waste consists of sludge, polymer and lime. The sludge is granular, similar to wet sand. The waste is not in a particle form but rather nickel size clumps. Material Stewardship, Radiological Engineering Department has evaluated the material and it's radiological content and does not require any additional radiological protection for completing this activity outside versus inside a tent. Previous surveys of the barn tent panels resulted in no found contamination during the treatment process of the same sludge.
- WO will only work outside in acceptable weather conditions. Wind or precipitation will be a constant consideration to continue operations. Operations will cease, and the intermodals will be covered, as necessary, immediately upon inclement weather conditions.
- Waste Operations will provide spill containment underneath the intermodals and underneath the areas where the backhoe's shovel carrying waste extends. The spill containment will be bermed on the east end (slope side) to prevent run off.

James Hindman discuss these reasons with Steve Gunderson and approval was given to perform this repack activity outside on the 750Pad.

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**Contact Record Prepared By:** Karen Lavorato

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